

Affidavit

County of Lorain

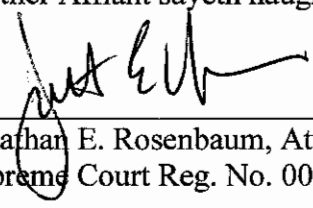
SS:

State of Ohio

Now comes the undersigned, Jonathan E. Rosenbaum, who being duly sworn states as follows:

1. The following is a true and accurate record of my time spent in and expenses incurred in prosecuting Jane Doe, et al v. Boland, USDCt ND Ohio Case No. 1:07cv2787;
2. \$200.00 per hour has been my usual and customary hourly rate for the past several years; and
3. \$200.00 per hour is a reasonable fee for legal services in Lorain County, Ohio;

Further Affiant sayeth naught.


Jonathan E. Rosenbaum, Attorney
Supreme Court Reg. No. 0021698

Sworn to and subscribed before me this 24th day of April, 2009.


Jennifer L. Andress, Notary Public



JENNIFER ANDRESS
Notary Public
State of Ohio
My Commission Expires 3-27-13

Time and Expenses

Client: Bloom / Rate: \$200.00

Date	Activity/ Expense	Time/Amount
	Background investigation re Boland	0.75
9-1-06	Attempt FOIA	1.25
	Obtain and Read SW, Diversion Agreement	2.0
9-9-07	Res re Priv. and Cause of Action	3.25
9-10-07	Res and Draft complaint;	7.0

9-11-07	Research (computer and law library) and draft federal complaint	2.5
9-13-07	Prepare Summons, Case Desig. Form, File lawsuit	1.5
10-21-07	Download and read Comp. res re state of limitation; print out Motion to Dis And Exs; Res rules regarding time for reply	3.25
10-24-07	Computer and library research for Br In Opp	3.75
10-25-07	Draft Br in Opp	8.0
10-26-07	Edit and Proof Br in Opp; Res	3.75
12-17-07	Speak with Istock Atty	0.25
12-19-07	Prepare Initial Disc Disclosure; Speak with Deft	1.5
12-21-07	Receive Third Party Complaint and Ans w/ cc; Computer Res re dismissal	1.25
12-23-07	Complete initial disclosure and est. costs and fees	4.0
12-26-07	Speak to Deft re planning order; Work on Motion to Dismiss; Draft Planning Meeting Report	8.0
12-27-07	Finalize and serve Motion to Dismiss	5.25
1-3-08	Finalize and send Planning Meeting Report with letter	0.50
3-3-08	Meet with S/A Sullivan and review images 1/2 travel time	1.75
3-4-08	Work on Disc Req to Deft; Review Docs and filings	5.0
3-5-08	Finalize Disc Req; Not of Serv; File and Serve	1.25
4-29-08	Read Emails re Discovery Response from Deft; Draft and file Notice of Deemed Admissions and Exhibits	2.25
4-30-08	Draft and send R37 letter; issue and serve 23 subs	6.5
5-2-08	Read disc Response; Draft, Research, File Br in Opp to Mot to w/d Deemed Admissions	3.25
5-5-08	Draft and email proposed joint SC report; Remind Clients of SC	1.0
5-12-08	Attend SC; Meet with clients Travel 60 mi	1.75
5-18-08	Review Court rulings and entries after download; Email Correspondence with Judge Pike and Atty Clark; Letter to Portage County Pros office	1.25
6-12-08	Travel to Cleveland (1/2 time) meet with SA Sullivan; review discovery	1.5
7-9-08	Travel to Cleveland to meet with SA Sullivan to open disc	1.5
7-10-08	Travel to Cleve for Sc; Attend SC; Meet with Clients, Speak with SA Sullivan; Draft sub ltr to USA off and FBI; Draft Sub; mail	3.25
7-17-08	Draft Res to Motion to strike	3.5
7-17-08	Rework Motion to Strike Res and file , Create Affidavits; Call Hamilton County PO and Ok USAO; create and serve 2 subs	6.0
7-23-08	Travel to FBI to Prepare for Depo and surrender Summit County CD	3.25
7-28-08	Prepare for depo.	6.25
7-29-08	Attend Depo of Deft	5.5
8-13-08	Draft serve and file Mot to Compel	1.0
8-20-08	Email Correspondence with Deft; res and prepare Aff Affecting Real Estate	1.25
8-21-08	Travel to Cleveland and File aff affecting Real Estate	1.75
	Attend and prepare for Depos of adult Plaintiffs	2.0

4-21-09	Draft Mot for SJ	1.75
4-22-09	Draft Mot for SJ	4.0
4-23-09	Finalize Mot for SJ	<u>3.5</u>
		127.75

127.75 hrs. x \$200.00/hr = \$25,550.00

Payments and Expenses

3-17-06	Travel to USA Office 60 mi plus \$5.00 parking	
9-13-07	Filing Fee	\$350.00
1-11-08	60mi and parking	\$7.00
3-3-08	30mi (1/2) travel	
5-1-08	CM for Subs	\$119.83
5-12-08	Parking \$6.00 60mi	
6-12-08	30 mi	
7-9-08	60 mi	
7-10-08	60 mi and \$6.00 parking	
7-18-08	CM to Boeing and Tulsa	\$10.98
7-23-08	60 mi	
7-29-08	60mi and \$6.00 parking	
8-15-08	M&H	\$272.00
8-21-08	Recording Fee \$60.00, parking \$2.25, 60 mi	

540.0 mi x \$0.45= \$243.00

Expenses: \$838.86